

BEFORE THE ARIZONA CORPORATION COMMISSION 1 Arizona Corporation Commission DOCKETED 2 **JIM IRVIN** Commissioner - Chairman APR 3 0 1999 3 DOCUMENT CONTR TONY WEST **DOCKETED BY** Commissioner 4 CARL J. KUNASEK Commissioner 5 IN THE MATTER OF US WEST) DOCKET NO. T-00000B-97-0238 6 COMMUNICATIONS, INC.'S COMPLIANCE WITH § 271 OF THE TELECOMMUNICATIONS) 7 **ARIZONA PAYPHONE** ACT OF 1996. ASSOCIATION'S RESPONSE TO **RESIDENTIAL UTILITY** 8 **CONSUMER OFFICE'S FIRST SET** 9 **OF DATA REQUESTS** Arizona Payphone Association ("APA"), hereby responds to Residential Utility Consumer 10 Office's ("RUCO") First Set of Data Requests. 11 12 Request No. 1: Please provide copies of data requests that have been issued and may be issued in 13 the future by all the parties to APA and responses to those requests. Response: The requested documents are being produce herewith. 14 RESPECTFULLY SUBMITTED this 30 day of April, 1999. 15 ROSHKA HEYMAN & DEWULF, PLC 16 17 18 Raymond S. Heyman Randall H. Warner 19 Two Arizona Center 400 North 5th Street, Suite 1000 20 Phoenix, Arizona 85004-3906 21 Attorneys for Arizona Payphone Association 22 23

1	Original and ten copies of the foregoing filed this 35th day of April, 1999, with:	
2	med this <u>55.</u> day of April, 1999, with:	
_	Docket Control	
3	Arizona Corporation Commission	
4	1200 West Washington Street Phoenix, Arizona 85007	
7	Thounx, ruizona 05007	
5	Copy of the foregoing hand-delivered this 24 day of April, 1999, to:	
6	In I Dudibough Chief Hearing Officer	
7	Jerry L. Rudibaugh, Chief Hearing Officer Hearing Division	
8	Arizona Corporation Commission 1200 West Washington Street	
9	Phoenix, Arizona 85007	
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16	Copies of the foregoing sent via U.S. Mail this 351 day of April, 1999, to:	
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16	8140 Ward Parkway, S.E. Kansas City, Missouri 64114
17	Charles Kallenbach
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STUART R.-BRACKNEY
ACTING EXECUTIVE SECRETARY

JIM IRVIN
COMMISSIONER-CHAIRMAN
TONY WEST
COMMISSIONER
ARL J. KUNASEK
COMMISSIONER



ARIZONA CORPORATION COMMISSION

March 9, 1999

Mr. Raymond Heyman Mr. Randall Warner Roshka, Heyman & DeWulf Two Arizona Center 400 North 5th Street Phoenix, Arizona 85004 Telefaxed and Mailed 256-6800

Re:

Staff's First Set of Data Requests -- Docket No. T-00000B-97-0238

Dear Mr. Heyman:

This is Staff's First Set of Data Requests to the Arizona Payphone Association. For each answer, please identify by name, title and address each person providing information which forms the basis for the responses provided to this set of data requests. These data requests are continuing and your answers or any documents supplied in response to these data requests should be supplemented with any additional information or documents that come to your attention after you have provided your initial responses.

Please provide one original and one copy of your responses and supporting documents to these responses within fourteen (14) days of receipt of this letter. If you have any questions please contact either Matthew Rowell at (602) 542-0858 or myself at (602) 542-3402.

Sincerely.

Maureen A. Scott

Attorney, Legal Division

(602) 542-6022

MAS:mi

cc:

Matthew J. Rowell

ARIZONA CORPORATION COMMISSION STAFF'S FIRST SET OF DATA REQUESTS TO THE ARIZONA PAYPHONE ASSOCIATION DOCKET NO. T-00000B-97-0238 March 9, 1999

Staff-1:	Please provide, on an ongoing basis, a copy of all your data requests to other parties.
Staff-2:	Please provide, on an ongoing basis, a copy of all your responses to the data requests of other parties.
Staff-3:	Please provide, on an ongoing basis, a copy of all your responses to requests for production of documents by other parties.
Staff-4:	Please provide, on an ongoing basis, a copy of notices or depositions and a copy of transcripts of any depositions taken of other parties.

BEFORE THE ARIZONA CORPORATION COMMISSION

2	JIM IRVIN
3	Commissioner - Chairman
4	TONY WEST Commissioner
7	CARL J. KUNASEK
5	Commissioner
6	IN THE MATTER OF US WEST) DOCKET NO. T-00000B-97-0238 COMMUNICATIONS, INC.'S COMPLIANCE)
7	WITH § 271 OF THE TELECOMMUNICATIONS) ARIZONA PAYPHONE
8	ACT OF 1996. ASSOCIATION'S RESPONSE TO STAFF'S FIRST SET OF DATA REQUESTS
9	, KEQUESTS
10	The Arizona Payphone Association ("APA"), hereby responds to Staff's First Set of Data
	Requests.
11	Request No. 1: Please provide, on an ongoing basis, a copy of all your data requests to other
12	parties.
14	Answer: APA has submitted no data requests to any other parties as of the date of this Response.
15	Request No. 2: Please provide, on an ongoing basis, a copy of all your responses to the data
	requests of other parties.
16 17	Answer: APA has not been required to respond to any data requests of other parties as of the date
	of this Response.
18	Request No. 3: Please provide, on an ongoing basis, a copy of all your responses to requests for
19	production of documents by other parties.
20	Answer: APA has not been required to respond to any request for production of documents by any
21	other party as of the date of this Response.
22	Request No. 4: Please provide, on an ongoing basis, a copy of notices or depositions and a copy
23	of transcripts of any depositions taken of other parties.
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Answer: APA has not noticed or taken any depositions in this matter as of the date of this Response.

RESPECTFULLY SUBMITTED this 30 day of April, 1999.

ROSHKA HEYMAN & DEWULF, PLC

Raymond S. Heyman Randall H. Warner Two Arizona Center

400 North 5th Street, Suite 1000 Phoenix, Arizona 85004-3906

Attorneys for Arizona Payphone Association

Original and ten copies of the foregoing

filed this 30 day of April, 1999, with:

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